



Miedel & Mysliwiec LLP

Application GRANTED. Further extensions are unlikely to be granted. The Clerk of Court is directed to terminate ECF No. 102.

April 28, 2021

Hon. Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

SO ORDERED.

April 29, 2021

Re: United States v. Robert Wilson, et. al. (19-CR-625 (JMF))

Dear Judge Furman,

Motions are due on April 30, 2021 in this case, which is scheduled for trial on January 4, 2022. Writing on behalf of the four defendants, I respectfully request one further 30-day extension of the motions deadline. The government consents to this request.

The defendants seek this extension because at least some are engaged in vigorous plea negotiations and discussions with the government that may lead to resolutions for those defendants. The government has made plea offers to at least two of the defendants with expiration dates of April 30 to coincide with the motions deadline, but has agreed to keep the plea offers open if the motions deadline is extended. Given the serious nature of the charges and plea offers that call for lengthy sentences, discussions with our clients require significant investments of time. We have made progress, and certain events will occur in early May that we believe will increase the likelihood of a pretrial resolution, including the commencement of social visits, which will allow our clients to have meaningful and confidential conversations with their families.

Since trial is still months away, an extension of the motions deadline will have no impact on the parties' ability to be ready for trial. Accordingly, the defendants jointly and respectfully request for the defense motions deadline to be extended June 1, 2021, with the government's response due on June 22, 2021. As noted, the government consents to this request.

Respectfully,

/s/

Florian Miedel
Attorney for Marquis Yohanis

cc: All Counsel